

Water Docket
Environmental Protection Agency
Mail Code: 2821T
1200 Pennsylvania Ave., NW.
Washington, D.C. 20460

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RE: Written comments for **Docket ID #**: EPA-R03-OW-2010-0736; the Chesapeake Bay TMDL

I am a farmer in Rockingham County, Virginia. I am also a member of the Mennonite faith. I'm concerned that several issues being discussed will affect my lifestyle and potentially my ability to farm. Please understand I choose not to participate in the legislative process or government programs for my personal financial benefit in accordance with my religious beliefs. That said I sincerely hope the following information will be considered when developing and implementing both the TMDL and the Watershed Improvement Plan for the State of Virginia.

First: Many of us have voluntarily implemented numerous Best Management Practices on our farms with no financial help from government agencies. No-till farming, fencing livestock out streams, nutrient management plan based fertilization, building manure management structures and riparian buffers are a few specific examples. We sincerely hope the plan will consider all of the practices we already have in place. We are willing to make additional improvements that are financially feasible.

Second: Many of the practices and requirements being discussed will be very costly to implement. High cost regulations without offsetting economic returns will place an extremely heavy burden on our farms and families – especially for those of us who don't accept government cost share. We hope required cures will be cost effective and have an implementation window long enough to allow them to be repaid with earnings.

Third: Nutrient reduction has been achieved through the voluntary practices we've already put in place. Many of the nutrient loading levels being discussed are based on research that is not yet proven. The models need to accurately reflect nutrient use from field crops. Average yields used in models are out of date with current yields generated on our farms. We hope any new regulatory burdens will be based on sound science with accurate yield models. We also need time to allow each incremental improvement to be evaluated.

Fourth: Proposed practices will place significant economic burden on agribusinesses – especially poultry integrators. These businesses could easily shift to other areas of the country with less stringent and less costly environmental requirements. Our family farms may lose income generating opportunities and no longer be viable if a shift like this occurs.

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Fifth: We have demonstrated our ability to work with state and local agencies to improve water quality. Many of our farms already have permits from various state agencies. We hope control of the plan and all regulations will be managed at the state level.

Sixth: Adding costly regulations without economic benefit may make young and beginning farmers unable to enter agriculture. The average age of farmers in the Chesapeake Bay watershed is increasing. Young and beginning farmers already face significant financial and environmental challenges which make farming difficult. Proposed regulations without offsetting financial benefit will only make this worse.

I appreciate the chance to comment on the proposed regulation. The environment is important to me and my family. We have worked hard to improve water quality in the Chesapeake Bay watershed. We hope all proposed regulations will be fair without putting our region, businesses and lifestyles at an economic disadvantage to other regions.

Sincerely,

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P.S. Please consider that if the farmers are not able to produce, due to financial burdens, those in the highest offices in Washington, D.C. will not remain unaffected. Too often our enlightened American people have been slow to understand where their daily food comes from. Failure to recognize the fragility of the food cycle invites serious trouble. If the city goes hungry, and they come out to the country to scavenge, will we be able to help them?